

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
KML Law Group, P.C. By: Denise Carlon, Esquire dcarlon@kmlawgroup.com 701 Market Street, Suite 5000 Philadelphia, PA 19106 215-627-1322 Attorneys for Movant: THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW YORK, AS TRUSTEE FOR THE CERTIFICATE HOLDERS OF THE CWABS INC., ASSET-BACKED CERTIFICATES, SERIES 2004-6	Case No.: <u>19-10683 JNP</u> Chapter: <u>13</u> Adv. No.: _____ Hearing Date: _____ Judge: <u>Jerrold N. Poslusny Jr.</u>
In Re: Jason M. Martinez Megan E. Martinez Debtor (s)	

**CERTIFICATION IN SUPPORT OF
MOTION FOR RELIEF FROM AUTOMATIC STAY**

I, Marcia Aida Thomas, declare under penalty of perjury as follows:

1. I am a/an Assistant Vice President of Bank of America, N.A., successor by merger to BAC Home Loans Servicing, LP ("BANA") and am authorized to sign this certification on behalf of BANA, as servicing agent for THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW YORK, AS TRUSTEE FOR THE CERTIFICATE HOLDERS OF THE CWABS INC., ASSET-BACKED CERTIFICATES, SERIES 2004-6 ("Movant") with respect to a certain loan (the "Loan") provided to Debtor(s), which Loan is evidenced by the Note (defined below) and secured by the Mortgage (defined below). This certification is provided in support of Movant's Motion for Relief from Stay (the "Motion").

2. As part of my job responsibilities for BANA, I have personal knowledge of and am familiar with the types of records maintained by BANA in connection with the Loan and the procedures for creating those types of records. I have access to the books, records and files of BANA that pertain to the Loan and extensions of credit given to Debtor(s) concerning the Property (defined below).

3. The information in this certification is taken from BANA's business records regarding the Loan. I have personal knowledge of BANA's procedures for creating these types of records. The records are: (a) made at or near the time of the occurrence of the matters recorded by persons with personal knowledge of the information in the business record, or from information transmitted by persons with personal knowledge; (b) kept in the course of BANA's regularly conducted business activities; and (c) it is the regular practice of BANA to make such records.

4. The Debtor(s) has/have executed and delivered or is/are otherwise obligated with respect to that certain promissory note in the original principal amount of \$172,900.00 (the "Note"). A copy of the Note is attached hereto as Exhibit A.

5. Pursuant to that certain Mortgage (the "Mortgage"), all obligations (collectively, the "Obligations") of the Debtor(s) under and with respect to the Note and the Mortgage are secured by the Property (as defined in the Motion). A copy of the Mortgage is attached hereto as Exhibit B.

6. All rights and remedies under the Mortgage have been assigned to the Movant pursuant to that certain assignment of mortgage, a copy of which is attached hereto as Exhibit C.

7. As of June 06, 2022, the outstanding amount of the Obligations less any partial payments or suspense balance is \$420,546.90

8. As of June 06, 2022 the per diem interest is \$11.27.

9. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred legal fees and legal costs. Movant reserves all rights to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

10. The following chart sets forth the number and amount of postpetition payments due pursuant to the terms of the Note that have been missed by the Debtor(s) as June 06, 2022:

Number of Missed Payments	From	To	Monthly Payment Amount	Total Missed Payments
1	04/01/2022	04/01/2022	\$1,372.05	\$1,372.05
2	05/01/2022	06/01/2022	\$1,448.36	\$2,896.72
Less postpetition partial payments (suspense balance):				(\$1,163.48)
				Total: <u>\$3,105.29</u>

11. As of June 06, 2022, the date of the last payment received is May 26, 2022.

12. Attached hereto as Exhibit D is the Certification Re Post-Petition Payment History on the Note and Mortgage.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 13th day of June, 2022.



Name: Marcia Aida Thomas
Title: Assistant Vice President